European Solar Manufacturing Council AISBL
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EUROPEAN SOLAR MANUFACTURING COUNCIL

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Contact for inquiries:
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Privacy Policy

How the European Solar Manufacturing Council processes personal data of members, partners, subscribers and website visitors

1. Who we are

The European Solar Manufacturing Council (ESMC) AISBL, 2-4 rue de Praetere, 1000 Brussels, Belgium, is the controller for the personal data described in this policy. ESMC is an international non-profit association under Belgian law. ESMC has not appointed a data protection officer; questions and requests go to [privacy@esmc.solar] or by post to the address above.

2. What this policy covers

This policy explains how ESMC processes personal data of individuals it deals with: representatives and contacts of member companies and applicants, participants in working groups and events, subscribers to newsletters and mailing lists, contacts at EU institutions, partner organisations and the press, suppliers, job applicants, and visitors to esmc.solar and its sub-domains (including crm.esmc.solar and lists.esmc.solar).

It is complemented by the ESMC Terms and Conditions, the ESMC Data Retention Policy (retention periods) and the ESMC Competition Law Compliance Statement (rules for meetings and electronic communication). Where a specific activity has its own information notice – for

example the welcome message of a mailing list or an event registration form – that notice applies in addition.

3. What we process, why and on which legal basis

Activity	Data	Purpose	Legal basis	Retention
Membership management	Name, position, business contact details of representatives and delegates; membership category; invoicing and payment data	Processing applications, administering membership and voting rights, invoicing fees, General Assembly notices	Art. 6(1)(b) GDPR (membership agreement with the member company, Articles of Association); Art. 6(1)(c) for accounting	Membership + 10 years; accounting records 7 years
Working groups and mailing lists	Name, organisation, e-mail address, messages and attachments sent to a list	Exchange of information among group members; archive for traceability of the group's work	Art. 6(1)(f) GDPR – legitimate interest in running its working groups; for members also part of the membership services	Life of the list + 3 years; messages of former members 2 years after leaving; see Data Retention Policy
Member communication	Business contact details	Information on ESMC activities, policy developments, meetings and consultations	Art. 6(1)(f) GDPR – legitimate interest in informing members; opt-out at any time	Duration of membership + 2 years
Newsletters and press distribution	E-mail address, name, organisation, opening and click statistics	Sending the newsletter or press releases you subscribed to from ESMC's own database; measuring reach	Art. 6(1)(a) GDPR – consent given at subscription (double opt-in); Art. XII.13 Belgian Code of Economic Law	Until withdrawal; inactive subscribers re-confirmed or removed after 2 years
Events and General Assemblies	Registration data, dietary and accessibility requirements where you provide them, attendance, proxy forms, photos and recordings where announced	Organising and documenting the event, access control, participant lists, statutory records of General Assemblies	Art. 6(1)(b)/(f) GDPR; Art. 9(2)(a) for special categories you volunteer; photos: Art. 6(1)(f) with notice and right to object, or consent for close-ups	Registrations 2 years after the event; governance records permanent; photos reviewed every 2 years
Surveys and data collection for advocacy	Contact details of the respondent; company data (capacities, investments, employment)	Industry statistics and policy positions	Art. 6(1)(f) GDPR; company data published only aggregated or anonymised	2 years after the survey; aggregated results indefinitely

Activity	Data	Purpose	Legal basis	Retention
Advocacy and stakeholder contacts	Business contact details of officials, MEPs, journalists, partner organisations; notes on meetings	Representing the interests of European solar manufacturing; press relations	Art. 6(1)(f) GDPR – legitimate interest in advocacy and public relations	2 years after last substantive contact
Website and contact forms	IP address, browser data, pages visited; data you enter in a form	Operating and securing the site; answering your request	Art. 6(1)(f) GDPR; cookies beyond the strictly necessary: consent	Logs 12 months; form data until the request is closed, then as operational e-mail
Suppliers and job applicants	Contact and contract data; application documents	Procurement and contract management; recruitment	Art. 6(1)(b) GDPR; Art. 6(1)(c) for accounting	Contracts 10 years; applications 6 months after the decision

Where processing is based on legitimate interest, ESMC has weighed its interest against your rights. You may object at any time (section 9). Where processing is based on consent, you may withdraw it at any time with effect for the future; withdrawal does not affect processing carried out before. ESMC does not use automated decision-making or profiling (Art. 22 GDPR).

4. Where your data comes from

Most data comes from you directly: when your company applies for membership or names you as its representative, when you register for an event or a working group, subscribe to a newsletter or contact us. Some data is provided by your employer (member or applicant company), by event partners when you register through them, or taken from public sources such as your organisation's website, the EU Transparency Register or professional networks, for the purpose of contacting you in your professional role.

5. Who receives your data

Within ESMC, access is limited to the Secretariat and, where required for governance, the Board. ESMC does not sell or rent personal data. Data is shared only:

- **with other participants:** your name, organisation and e-mail address are visible to the other members of a working group or mailing list you take part in, and to other participants of events you attend (participant lists, name badges).
- **with processors** that act on ESMC's instructions under data processing agreements: EU-based hosting and IT services for the website, the contact database (CiviCRM, which also sends newsletters and member mailings), mailing lists, e-mail and document storage; event-registration and video-conference tools; accounting and payment services. The current list of processors is available on request.
- **with EU institutions and public bodies** only in aggregated or anonymised form, unless a legal obligation or your explicit consent provides otherwise – for example when you are registered as a speaker or participant of a meeting hosted by an institution.
- **with authorities, courts or advisers** where required by law or to establish, exercise or defend legal claims.

All ESMC systems that hold membership, contact and communication data – the contact database, mailing lists, e-mail and document storage – are hosted on servers in the European Union and operated by EU-based providers. ESMC does not use US-based marketing or analytics services. Personal data leaves the EU/EEA only when you take part in an online meeting or survey run on a third-party platform (indicated in the invitation) or when ESMC corresponds with contacts outside the EU; ESMC then relies on an adequacy decision or the Standard Contractual Clauses of 2021.

6. Website, cookies and analytics

esmc.solar is operated with a consent banner. Strictly necessary cookies (session, security, consent memory) are set without consent on the basis of Art. 6(1)(f) GDPR and the Belgian Electronic Communications Act. All other cookies and similar technologies – analytics, embedded media (e.g. video players, maps), social-media sharing functions – are set only after you have

given consent, which you can change or withdraw at any time via the cookie settings link in the footer of every page. Without consent these functions are not loaded.

ESMC does not use Google Analytics or other third-party tracking services on its website. Usage statistics, where collected, are derived from server log files or from a privacy-friendly tool hosted on ESMC's own servers that stores no cookies and no complete IP addresses. Server log files (shortened IP address, browser type, time and page requested) are kept for 12 months for security purposes.

ESMC's pages on LinkedIn and other social networks are operated by those networks under their own privacy policies; ESMC sees only aggregated statistics.

Newsletters and member mailings are sent from ESMC's own contact database hosted in the EU. They may contain a tracking pixel that records whether a message was opened and which links were clicked. For newsletters this is based on your consent given at subscription; for member communication it is based on ESMC's legitimate interest in measuring the relevance of its communication. You can prevent it by blocking external images in your e-mail client. Messages on ESMC mailing lists are not tracked.

7. How long we keep your data

ESMC keeps personal data only as long as needed for the purpose it was collected for or as long as the law requires. The periods for each category are set out in the ESMC Data Retention Policy, which is an annex to this policy. In short: contact data for the duration of the relationship and two years after the last substantive contact; membership records for ten years after the end of membership; accounting records for seven years; mailing-list archives for the life of the list and three years after its closure, with messages of former members removed two years after they leave; newsletter data until you unsubscribe.

8. How we protect your data

ESMC applies technical and organisational measures appropriate to the risk: encrypted connections (TLS) to all ESMC systems, role-based access with individual accounts and multi-factor authentication for administrators, regular updates and backups, access logging, processors bound by data processing agreements, and confidentiality obligations for staff. Backups are retained according to the Data Retention Policy. Should a personal data breach occur that is likely to result in a high risk to you, ESMC will inform you without undue delay.

9. Your rights

Under Articles 15 to 22 GDPR you have the right to:

- access the personal data ESMC holds about you and receive a copy;
- have inaccurate data rectified and incomplete data completed;
- have your data erased where there is no longer a reason for ESMC to keep it;
- have processing restricted while a request is examined;
- receive the data you provided in a structured, machine-readable format (portability);
- object at any time to processing based on legitimate interest, and at any time and without giving reasons to direct marketing, including newsletters and member mailings;
- withdraw consent at any time, with effect for the future.

To exercise your rights, write to secretariat@esmc.solar. ESMC answers within one month; for complex requests this may be extended by two further months, in which case you will be informed. ESMC may ask you to confirm your identity where there is reasonable doubt. Requests are free of charge unless manifestly unfounded or excessive.

You also have the right to lodge a complaint with a supervisory authority, in particular the Belgian Data Protection Authority (Autorité de protection des données / Gegevensbeschermingsautoriteit, Rue de la Presse 35, 1000 Brussels, contact@apd-gba.be,

www.dataprotectionauthority.be) or the authority of the EU Member State where you live or work.

10. Changes to this policy

ESMC reviews this policy at least every two years and whenever its systems, its activities or the law change. The version date is shown at the top. Material changes that affect you are communicated by e-mail or through the mailing lists; the current version is always available at esmc.solar/privacy.

Related documents

- ESMC Terms and Conditions (v1.0, 9 February 2026)
- ESMC Data Retention Policy (annex to this policy)
- ESMC Competition Law Compliance Statement; mailing-list information pages (linked from every list message)